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REC'D TN  
REGULATORY

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July 12, 2002

OFFICE OF THE  
EXECUTIVE SECRETARY

The Honorable Sara Kyle, Chairman  
Tennessee Regulatory Authority  
460 James Robertson Parkway  
Nashville, TN 37243-0505

In Re: BellSouth Telecommunications, Inc.'s Entry Into Long Distance (InterLATA)  
Service in Tennessee Pursuant to section 271 of the Telecommunications Act of  
1996

Docket No. 97-00309

Dear Chairman Kyle:

Please accept for filing the original and fourteen copies of the testimony of Mary  
Conquest on behalf of ITC ^DeltaCom Communications Inc. in the above-captioned proceeding.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:

Henry Walker

HW/nl  
Attachment

7/16/02

CERTIFICATE OF SERVICE

I hereby certify that on the 12<sup>th</sup> day of July, 2002, a copy of the foregoing document was served on the parties of record, via hand-delivery, overnight delivery or U.S. Mail, postage prepaid, addressed as follows:

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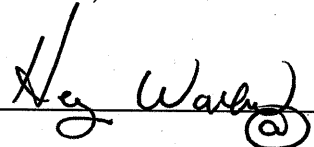
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\_\_\_\_\_

1 Q: PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

2 A: My name is Mary Conquest. I am employee of ITC^DeltaCom Communications,  
3 Inc., ("ITC^DeltaCom"), and my business address is 600 Boulevard South,  
4 Huntsville, Alabama 35802.  
5

6 Q: PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR EDUCATION AND  
7 WORK HISTORY.

8 A: My education and relevant work experience are as follows:

9 I received a masters certificate from George Washington University for project  
10 management. I have been employed in the telecommunications industry for over  
11 thirty-five years. I began my career with Southern Bell in 1966. I held various  
12 positions within BellSouth over that time period as an employee and as a  
13 consultant. My last position with BellSouth was as a Certified Project Manager in  
14 IT. I also acted as a consultant to BellSouth in the area of billing. As part of the  
15 billing assignment, I supported their development of J Billing ("UNE-P"). I retired  
16 from BellSouth in December of 1996. My consultant assignment for BellSouth  
17 occurred between 1997-1999. As a manager of BellSouth's regional service  
18 order support staff, I am very familiar with BellSouth's legacy systems. I am  
19 employed by ITC^DeltaCom and specialize in the areas of OSS – ordering and  
20 gateway support to ILECs including but not limited to BellSouth.  
21

22 Q: HAVE YOU PREVIOUSLY TESTIFIED BEFORE THIS COMMISSION?

23 A: NO.

1 Q: HAVE YOU ATTENDED ANY OSS WORKSHOPS ?

2 A: Yes. I have attended state workshops/conference calls in Texas, Florida,  
3 Georgia, and Louisiana that covered a wide range of topics including: OSS,  
4 performance measures, and third-party testing.

5  
6 Q: WHAT IS THE PURPOSE OF YOUR TESTIMONY?

7 A: The purpose of my testimony is to

- 8
- 9 • Discuss the Disparity in Operation Service System Support (OSS)
  - 10 • inadequate Change Management Process;
  - 11 • flawed Performance Measurement Process; and
  - 12 • advocate that this Commission undertake an independent third party test
  - 13 that is specific to Tennessee
- 14

15 Q: EXPLAIN WHY ITC^DELTACOM DOES NOT HAVE THE SAME OR SIMILAR  
16 ACCESS TO OSS THAT BELLSOUTH RETAIL REPRESENTATIVES ENJOY.

17 A: ITC^DeltaCom does not enjoy the same level of OSS support as does  
18 BellSouth's retail customer. Pending Orders are discussed with the retail  
19 customer during the initial order contact; whereas, the CLEC's request for  
20 service must be clarified. BellSouth representatives are able to view the pending  
21 change orders and discuss with the customer the disposition of the work ordered.

1 CLEC's must have the customer who is in migration dispose of the pending work  
2 and wait patiently while orders are slowly worked or canceled and clear the  
3 system. In an effort to resolve the disparity ITC^DeltaCom has been the  
4 originator for two Change Control requests for which no resolution has been  
5 delivered. Change Control is the process by which updates are made to the  
6 OSS systems.

7 In fact BellSouth only allows CLEC's a pending order flag via one interface  
8 (LENS), which was broken as the result of a coding defect for several months.  
9 This flawed approach prohibits CLECs from delivering service in a timely manner  
10 and affords BellSouth additional opportunity to Win Back or dissuade the  
11 customer from leaving BellSouth.

12 Exhibit A are snapshots of the screens the ITC^DeltaCom Service  
13 Representatives see while attempting to work customer orders.

14  
15 Q: IN WHAT OTHER AREAS IS BELLSOUTH'S PROVISION OF OSS  
16 DISCRIMINATORY?

17 A: Change Control. ITC^DeltaCom continues to be penalized as the result of slow  
18 delivery of enhancement and defect coding changes. While CLECs pay for  
19 operational system support, the bulk of code deliveries are defect fixes.  
20 BellSouth is working to improve testing processes, however the bulk of software  
21 release capacity is devoted to cleaning up defects caused by the release. Exhibit

1 B is a chart detailing the Release Package content and delivery dates. BellSouth  
2 still refuses to give CLEC's insight and voice into the full prioritization process.  
3

4 Q: WHAT DO WE KNOW OF BELL SOUTH'S PERFORMANCE?

5 A: Performance Measurement Platform (PMAP). No formal governing process other  
6 than Commission appeal exists for resolution of business issues. Data is  
7 continually recalculated, reloaded, reformatted, readjusted, all in an effort to meet  
8 BellSouth's internal descriptions without full disclosure of the changes being  
9 made. BellSouth should make full disclosure of all data changes 60 days in  
10 advance of making a change giving CLECs an opportunity to adjust their internal  
11 auditing systems in sync with BellSouth. Operational reports, i.e. Line Loss  
12 Notification, reside on the PMAP web site, however, BellSouth does not support  
13 outage notification process for these functions. While BellSouth admits to  
14 making changes requested for "a specific" CLEC, no formal process exists for  
15 CLECs to request additional data fields, changes, or challenge of data validity.  
16

17 Q: WHY SHOULD THIS COMMISSION CONDUCT AN INDEPENDENT THIRD  
18 PARTY TEST?

19 A: BellSouth has the burden of establishing that each and every requirement of 271  
20 including the obligation to provide nondiscriminatory access to its services and  
21 facilities is satisfied. BellSouth relies heavily on its self-reported service quality  
22 measurement (SQM) report. Before this Commission should rely on that self-

1 reported data to determine check list compliance, reasonable assurance that the  
2 data reported is accurate and complete must be determined. BellSouth frequently  
3 posts the performance data and makes changes to that data at random and  
4 without prior to notice to ITC^DeltaCom. These frequent changes to the data  
5 make auditing extremely burdensome.

6 Therefore, I recommend that this Commission staff audit or employ an  
7 independent third party to review the accuracy of BellSouth's self-reported data.

8  
9 Q: DOES THIS CONCLUDE YOUR TESTIMONY?

10 A: Yes. BellSouth has failed to meet the requirements for 271 in the state of  
11 Tennessee, and I recommend that you order BellSouth to comply with the  
12 requirement of providing nondiscriminatory OSS before granting their petition.

BST Release	Prod. Date	CR:2,4 &5	Defect:6
10.3	1-05-02	369,441,229,409, 422	459,527,530,532, 536,537,540,542, 570,571,573 602
10.3a	1-11-02		
10.3.1	2-02-02	557,371,606,040, 133	459,580,588,589, 590,591,592,593, 594,595,596,597, 598,599,600,601, 608,610,612,626 520,643
10.3.2	2-09-02		
10.4	3-23-02	016,651,137,657, 040,096,543	611,620,627,628, 632,633,634,635, 636,637,638,639, 658,703 706,713,715,716
10.4.1	3-28-02		
10.5	5-18-02	368,461,365,078, 494,038,040,557, 020,145,146	471,472,473,535, 574,586,618,642, 668,678,679,682, 692,697,705,735, 738,740,741,745 831
10.5a	6-16-02		
10.6	8-24-02	029,0196,241,541 ,707,725,756,160	339,682,693,704, 730,743,753,758, 766,769,800,810, 823,824,825,838

EXHIBIT

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